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6 Attorneys for Defendant
PrO Unlimited, Inc.

8 IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

11 MICHAEL LAZARIN, STEPHEN KOHLER,
12 and PAUL CAPANO, individually and on
13 behalf of other members of the general public
similarly situated, and as aggrieved employees
pursuant to the Private Attorneys General Act
("PAGA")

14 Plaintiffs,

15 || v.

16 PRO UNLIMITED, INC., JUNIPER
17 NETWORKS, INC., JUNIPER
18 NETWORKS HOLDINGS
INTERNATIONALO, INC., and JUNIPER
NETWORKS (US), INC.

19 Defendants.

Case No. 5:11-CV-03609-HRL

**JOINT STIPULATION TO EXTEND TIME
FOR FILING RULE 26(f) REPORT, INITIAL
DISCLOSURES, AND CMC CONFERENCE;
AND ~~PROPOSED~~ ORDER**

(AS MODIFIED BY THE COURT)

WHEREFORE, pursuant to Federal Rule of Civil Procedure 16(b)(7), and for good cause,
plaintiffs Michael Lazarin, Stephen Kohler, and Paul Capano (“Plaintiffs”), and defendant PrO
Unlimited, Inc. (“Defendant”), by and through their respective attorneys of record, hereby jointly
stipulate and request that the Court vacate the dates set forth in the Order Setting Initial Case
Management Conference and ADR Deadlines filed on July 22, 2011, and that the Court continue
such dates as set forth in the stipulation below. The reason for this request and stipulation is that
Defendant recently retained new counsel and filed a Notice of Withdrawal and Substitution of

1 Counsel for Defendant on September 27, 2011. As a result, Defendant's new counsel requires 30
 2 days to review the facts and allegations in the case to meaningfully participate. As a courtesy,
 3 Plaintiffs do not oppose and have agreed to stipulate to the request for extension.

4 WHEREFORE, the Parties hereby stipulate and request as follows:

5 1. The current deadline of September 27, 2011, to file the Rule 26(f) Report, to
 6 complete initial disclosures, to state objections in the Rule 26(f) Report, and to file
 7 a Case Management Statement per the Court's Standing Order re Contents of Joint
 8 Case Management Statement, be continued ~~for 30 calendar days to October 27,~~ November 15, 2011
 9 ~~2011~~;

10 2. The current deadline of September 27, 2011, to file a joint case management
 11 statement, be continued ~~for 30 calendar days to October 27, 2011~~ November 15, 2011; and

12 3. The Initial Case Management Conference presently set for October 4, 2011, be
 13 continued ~~to November 3, 2011~~ November 22, 2011

14 IT IS SO STIPULATED.

15
 16 Date: September 27, 2011 JACKSON LEWIS LLP

17
 18 By: /s/
 Cary G. Palmer
 19 Attorneys for Defendant
 20 PrO Unlimited, Inc.

21 Date: September 27, 2011 RUKIN HYLAND DORIA & TINDALL LLP

22
 23 By: /s/
 Peter Rukin
 24 Attorneys for Plaintiffs

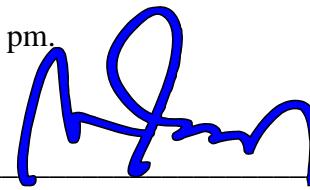
1 FOR GOOD CAUSE, IT IS HEREBY ORDERED AS FOLLOWS:

2 1. The current deadline of September 27, 2011, to file the Rule 26(f) Report, to
3 complete initial disclosures, to state objections in the Rule 26(f) Report, and to file
4 a Case Management Statement per the Court's Standing Order re Contents of Joint
5 Case Management Statement, is hereby continued for ~~30 calendar days~~ to ~~October~~
November 15, 2011
27, 2011;

6 2. The current deadline of September 27, 2011, to file a joint case management
7 statement, is hereby continued ~~for 30 calendar days to October 27, 2011~~ to ~~October~~
November 15, 2011; and

8 3. The Initial Case Management Conference presently set for October 4, 2011, is
9 ~~November 22, 2011~~
hereby continued to ~~November 3, 2011~~, at 1:30 pm.

10 11 Dated: September 28, 2011



12 HONORABLE HOWARD R. LLOYD
13 MAGISTRATE JUDGE OF THE
14 UNITED STATES DISTRICT COURT

15 4812-1623-7067, v. 1

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1 **C 11-03609 HRL Notice will be electronically mailed to:**

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7 **Counsel are responsible for distributing copies of this document to co-counsel who have not**
8 **registered for e-filing under the court's CM/ECF program.**